

**BEFORE THE WEST VIRGINIA BOARD OF MEDICINE**

**WEST VIRGINIA BOARD OF MEDICINE,**

**PETITIONER,**

**v.**

**LEONARD ANTHONY REYNOLDS, D.P.M.,**

**RESPONDENT.**

**COMPLAINT AND NOTICE OF HEARING**

Now comes the Petitioner, the West Virginia Board of Medicine ("Board") who states the following:

1. The Respondent, Leonard Anthony Reynolds, D.P.M. ("Dr. Reynolds"), is licensed to practice podiatry in West Virginia and has been so licensed in West Virginia since 1992.
2. Dr. Reynolds' license is identified as West Virginia License No. 00271, and his address of record with the Board is in Wellsburg, West Virginia.
3. On December 17, 2009, the District Court entered a Default Judgment Order against Dr. Reynolds in the amount of one million, four hundred seventy one thousand, and one hundred three dollars and fifty seven cents (\$1,471,103.57). Underlying the Default Judgment was a Complaint filed by the United States against Dr. Reynolds on April 17, 2007, asserting fraudulent practices, including the following: submitting claims for payment to Medicare for evaluation and management services not rendered and submitting claims for

payment to Medicare for debridement when the services provided were, in fact, non-covered routine foot care.

4. Based on the facts set forth in paragraph three (3), Dr. Reynolds engaged in unprofessional and unethical conduct, in violation of West Virginia Code §30-3-14(c)(17) and 11 CSR 1A 12.1(e) and (j).

5. Based on the facts set forth in paragraph three (3), Dr. Reynolds engaged in conduct which is calculated to bring or has the effect of bringing the podiatric profession into disrepute, in violation of West Virginia Code §30-3-14(c)(17) and 11 CSR 1A 12.2(d).

6. Based on the facts set forth in paragraph three (3), Dr. Reynolds has filed or made a report which he knew to be false, in violation of West Virginia Code §30-3-14(c)(17) and 11 CSR 1A 12.1(p).

7. Based on the facts set forth in paragraph three (3), Dr. Reynolds made deceptive, untrue or fraudulent representations in the practice of podiatry, in violation of West Virginia Code §30-3-14(c)(9) and (17) and 11 CSR 1A 12.1(s).

8. Based on the facts set forth in paragraph three (3), Dr. Reynolds violated or attempted to violate any law or lawfully promulgated rule or regulation of this State, any other state, the Board, the United States or any other lawful authority, in violation of West Virginia Code §30-3-14(c)(17) and 11 CSR 1A 12.1(bb).

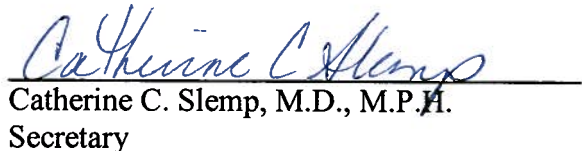
9. Based on the facts set forth in paragraph three (3), Dr. Reynolds charged and collected excessive, unconscionable fees, in violation of West Virginia Code §30-3-14(c)(17) and 11 CSR 1A 12.2(i).

Accordingly, Respondent, Dr. Reynolds is hereby notified that a hearing will be convened on May 6, 2011, at 9:00 a.m. in the offices of the West Virginia Board of Medicine. The purpose of the hearing will be to determine whether disciplinary action should be imposed upon Dr. Reynolds' license to practice podiatry in West Virginia. Respondent, Dr. Reynolds, must be present in person, may be accompanied by an attorney if he desires, and may present witnesses or other evidence which he may desire to present on his behalf. Failure of Dr. Reynolds to serve an Answer on Petitioner Board within thirty (30) days after service of the Complaint and Notice of Hearing upon him entitles Petitioner Board to take all of the allegations herein as confessed by Dr. Reynolds, under provisions of 11 CSR 3 11.5(s). Dr. Reynolds shall, in writing and within fifteen (15) days of receipt of this Complaint and Notice of Hearing, select as Hearing Examiner, either Jack C. McClung, Esquire, or Jennifer Taylor, Esquire, to preside at and conduct the proceedings.

Dated this 2nd of March, 2011.

WEST VIRGINIA BOARD OF MEDICINE

  
Reverend O. Richard Bowyer  
President

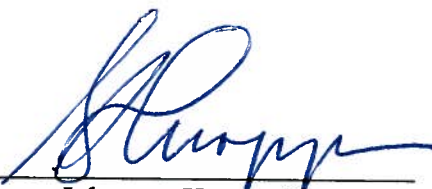
  
Catherine C. Slemp, M.D., M.P.H.  
Secretary

**CERTIFICATE OF SERVICE**

I, Steven Johnston Knopp, counsel for Petitioner, the West Virginia Board of Medicine, do hereby certify that I have served the foregoing "Complaint and Notice of Hearing" upon Respondent and Respondent's Counsel by depositing copies of the same in the United States mail, postage prepaid, certified mail, this 4th day of March, 2011, addressed as follows:

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